

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
TEXAS MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-203-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;	)	
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF  
PLAINTIFF NETLIST, INC.'S MOTION TO STRIKE OPINIONS OF DR.  
MATTHEW LYNDE**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion to Strike Opinions of Dr. Matthew Lynde. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of the Expert Report of Matthew R. Lynde, Ph.D., dated October 30, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of Schedules 11 through 13 and Workpapers A through D to the Expert Report of Matthew R. Lynde.

4. Attached as **Exhibit 3** is a true and correct copy of the Strategic Product Supply and License Agreement between Netlist and SK Hynix Inc., produced at Bates NETLIST\_SAMSUNG\_EDTX00037749.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the JEDEC Manual of Organization and Procedure, (“JM21U”) dated December 2022.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the transcript of the September 15, 2023 deposition of Dave Westergard.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of Defendants’ Sixth Supplemental Responses and Objections to Plaintiff Netlist, Inc.’s First Set of Interrogatories, dated September 20, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of the ETSI Guide on Intellectual Property Rights (IPRs).

9. Attached as **Exhibit 8** a true and correct excerpted copy of email correspondence from Netlist’s counsel to Micron’s counsel dated November 3, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby  
Jason G. Sheasby